

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**ALVA JOHNSON,
Individually and On Behalf of All Others
Similarly Situated,**

Plaintiff,

Case No. 8:19-cv-00475-WFJ-SPF

v.

**DONALD J. TRUMP,
In his Individual Capacity and
DONALD J. TRUMP FOR
PRESIDENT, INC.**

Defendants.

/

MOTION FOR LEAVE TO MANUALLY FILE VIDEO EXHIBITS

Defendants Donald J. Trump (“Mr. Trump”) and Donald J. Trump for President, Inc. (collectively, “Defendants”) move this Court for leave to file two (2) video exhibits in support of their Motion for Protective Order and Memorandum of Law in Support thereof (“Motion for Protective Order”), based on the following good cause:

1. On July 10, 2019, Defendants filed the Motion for Protective Order. [Dkt. No. 73.]
2. Attached as Exhibit A to the Declaration of Brian Hayes filed in support of the Motion for Protective Order is a true and correct copy of Mr. Hayes’ audiovisual recording of plaintiff Alva Johnson’s (“Plaintiff”) encounter with Mr. Trump in a recreational vehicle, during a campaign event on August 24, 2016 in Tampa, Florida.
3. Attached as Exhibit O to the Declaration of Charles J. Harder filed in support of

the Motion for Protective Order is a true and correct copy of an excerpt of Brian Hayes' audiovisual recording of the August 24, 2016 encounter between Plaintiff and Mr. Trump, which has been digitally slowed down to 25% of 100% of its speed.

4. The Court's CM/ECF system only permits filing of files in Portable Document Format ("PDF"). *See* FLMD Administrative Procedures for Filing Electronic Documents, §IV(A)(1).

5. The above-referenced videos cannot be converted to PDF format, and therefore cannot be submitted electronically through the Court's CM/ECF system.

6. Accordingly, Defendants have submitted true and correct copies of the aforementioned videos to the Court on two (2) USB Flash Drives, and respectfully request that the Court grant them leave to manually file these videos.

7. The true and correct copies of the aforementioned videos also can be viewed at the following URL address: www.HarderLLP.com/JohnsonVideo.

Dated this 10th day of July, 2019

Respectfully Submitted,

/s/ Charles J. Harder

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Donald J. Trump and
Donald J. Trump for President, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 10, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will electronically send a notice of electronic filing upon the following:

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